

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

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UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

v.

Case No. 19-cv-809

BLUEPOINT INVESTMENT COUNSEL,  
LLC, et al.,

Defendants.

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**MOTION FOR LEAVE TO WITHDRAW AS ATTORNEYS  
OF RECORD FOR DEFENDANTS**

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Attorneys Patrick S. Coffey and Robert M. Romashko, and the law firm Husch Blackwell LLP (“HB”) respectfully move to withdraw as attorneys of record for Defendants Bluepoint Investment Counsel, LLC, (“Bluepoint”), Michael G. Hull (“Hull”), Christopher J. Nohl (“Nohl”), Chrysalis Financial, LLC (“Chrysalis”), Greenpoint Asset Management II, LLC (“GAM”), Greenpoint Tactical Income Fund, LLC (“GTIF”), and GP Rare Earth Trading Account, LLC (“GPRE”) (collectively, “Defendants”).

The following is stated in support of this Motion:

1. In October 2019, HB was engaged as counsel to represent Bluepoint, Hull, Nohl, Chrysalis, and GAM in connection with the pending matter. In March 2020, in connection with its appointment as special counsel by the United States Bankruptcy Court for the Eastern District of Wisconsin (the “Bankruptcy Court”), HB was engaged as counsel for GTIF and GPRE.

2. As a result of professional considerations, HB seeks leave to withdraw from its representation of Defendants. HB seeks immediate leave to withdraw from its representation of

Bluepoint, Hull, Nohl, Chrysalis, and GAM. HB seeks leave to withdraw from its representation of GTIF and GPRE contingent on receiving authorization to do so from the Bankruptcy Court. HB is concurrently moving for such authorization and will supplement this filing once that motion is acted upon by the Bankruptcy Court.

3. Defendants have been in discussions with counsel concerning the possibility of withdrawal for an extended period, and were notified in writing on February 4, 2021 that HB intended to withdraw in this matter. Wisconsin SCR 20:1.16(b) allows a lawyer to terminate a representation, and at least one of these conditions exists in the present matter. To preserve client confidentiality, HB has not disclosed those conditions in this Motion.

4. Trial in this matter is scheduled for January 2022 and withdrawal of counsel will not delay trial of this case. Discovery in this matter is still ongoing, and there is a February 8 deadline for supplemental filings related to Defendants' Motion to Compel Discovery and a February 16 hearing on same. There are also various discovery requests, including Requests to Admit, which have been served by Plaintiffs, responses to which are due in mid-February. Further, there are depositions of Nohl and Hull set for late February 2021, followed by other witness depositions in March, 2021. HB respectfully requests the Court enter a stay of all discovery pending the appearance of replacement counsel.

5. HB further requests that the Court set a status hearing in order to allow the Defendants to secure replacement counsel and report on that and other case matters within 21 days.

6. A copy of this Motion has been provided via mail and email to Defendants.

WHEREFORE the undersigned respectfully requests the Court grant this Motion for Leave to Withdraw as Attorneys of Record for Defendants Greenpoint Tactical Income Fund, LLC, GP

Rare Earth Trading Account, LLC, Chrysalis Financial, LLC, Bluepoint Investment Counsel, LLC,  
Greenpoint Asset Management II, LLC, Michael Hull, and Christopher Nohl.

Dated: February 5, 2021

HUSCH BLACKWELL LLP,  
Attorneys for Defendants

By: /s/ Patrick S. Coffey

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed via the Court's electronic filing system on this 5th day of February, 2021, to be served by operation of the electronic filing system on all ECF-registered counsel of record. Copies were also served by mail and e-mail on Defendants as follows:

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/s/ Patrick S. Coffey